

August 4, 2014

AUG -7 2014

Genevieve Damico, Chief
Air Permits Section (AR-18J)
US EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

**Re: Permit Renewal Application, Grand Casino Mille Lacs
Title V Permit to Operate, Permit Number: V-ML-2709500005-2009-01**

Dear Ms. Damico:

This letter is in response to the additional information requested in the July 11, 2014 letter for the Title V permit renewal for Grand Casino Mille Lacs located in Onamia, MN. This letter is organized such that the July 11, 2014 letter additional information request citation is presented, and Grand Casino Mille Lacs response is presented after the citation.

Laundry Emergency Generator (EU-005) Additional Information

EPA July 11, 2014 Letter Citation:

- 1) *Please submit additional information to support that the laundry emergency generator is an emergency generator that does not trigger additional requirements. This information may include, but is not limited to, the following:*
 - a. *Emergency generator annual hours of operation per year since 1992;*

Grand Casino Mille Lacs Response:

The laundry emergency generator (EU-005) annual hours of operation are presented in Table 1.

Table 1 EU-005 Laundry Generator Annual Hours of Operation

Year	'92	'93	'94	'95	Engine Data Not Available 1995- 2004	'05	'06	'07	'08	'09	'10	'11	'12	'13	'14
Total Hours	90	276	370	419		713	720	734	746	751	754	756	762	767	773
Hours per Year	90	186	94	49		N/A	7	14	12	5	3	2	6	5	6

The existing laundry facility was built in 2005. EU-005 had been previously used as an emergency backup generator for the casino, but was moved to the laundry facility in 2005. There is a gap in the records of operating hours between 1995 and 2005; however, during that period the engine operated a total of 294 hours. EU-005 did not operate more than 500 hours in any single year, which is consistent with the Title V permit policy for emergency generators.

EPA July 11, 2014 Letter Citation:

b. Maintenance records;

Grand Casino Mille Lacs Response:

The laundry generator maintenance records are included in Attachment 1. After the May 3, 2013 compliance date for 40 CFR 63 Subpart ZZZZ, annual maintenance has included the required work practice standards for an emergency engine. Work practice standards include changing the oil and filter, inspecting the air cleaner, and inspecting all hoses and belts and replacing as necessary.

EPA July 11, 2014 Letter Citation:

c. Emergency generator manufacturer specifications;

Grand Casino Mille Lacs Response:

The laundry generator manufacturer specifications from the engine vendor are included in Attachment 2.

EPA July 11, 2014 Letter Citation:

d. An explanation of how operation of the laundry emergency generator differs from the other generators at the facility; and

Grand Casino Mille Lacs Response:

EU-005 is operated only to provide electrical power during a utility power outage or during maintenance activities, as opposed to the operation of EU-001, EU-002, EU-003, and EU-004, which are operated as peaking generation sources as well as emergency backup units.

EPA July 11, 2014 Letter Citation:

e. Whether the laundry emergency generator was used for peak load management or other non-emergency operations since it was installed in 1992.

Grand Casino Mille Lacs Response:

EU-005 has never operated under a contract with the utility as part of a peak load management program. EU-005 was operating as the emergency generator for the casino prior to its re-

installation as the emergency generator for the laundry machines in 2005. The only non-emergency operations include maintenance and readiness checks as per vendor recommendations, as allowed by 40 C.F.R. §63.6640(f)(2)(i).

Carbon Monoxide (CO) Reduction Discussion

EPA July 11, 2014 Letter Citation:

Please identify whether you will comply with either the Carbon Monoxide (CO) concentration limit or the CO reduction limit required by 40 C.F.R. § 63.6603(a). Your choice of CO emission limit will also determine periodic performance test requirements required by 40 C.F.R. § 63.6620, as listed in table 4 of 40 C.F.R. 63, Subpart ZZZZ. This will enable us to specify the proper applicable requirements in the permit.

Grand Casino Mille Lacs Response:

EU-001, EU-002, EU-003, and EU-004 are subject to 40 C.F.R. Subpart ZZZZ Table 2d (3) which states that engines must either "limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂; **or** reduce CO emissions by 70 percent or more" (**emphasis added**). Complying with this regulation does not require an initial commitment as to which limit must be met. Grand Casino Mille Lacs would like to retain the ability to choose the appropriate testing method to remain in compliance with either of the CO limits. Grand Casino Mille Lacs therefore requests that EPA retains both CO percent reduction and CO concentration periodic performance test requirements from 40 C.F.R. § 63.6620 and Table 4 of 40 C.F.R. 63, Subpart ZZZZ.

Peaking Generators Additional Information

EPA July 11, 2014 Letter Citation:

Please provide the actual number of hours of operation for engines EU001, EU002, EU003, and EU004 for 2011 and 2012. The hours of operation will allow us to determine whether the engines are limited use engines, as defined at 40 C.F.R. §63.6675. This will ensure that the proper CO testing interval is included in the permit.

Grand Casino Mille Lacs Response:

The actual number of hours of operation for EU-001, EU-002, EU-003, and EU-004 are included in Table 2. Grand Casino Mille Lacs has reduced the number of hours for maintenance and testing since the compliance date of May 3, 2013, so that the engines will remain limited use engines, if possible. The definition of limited use engines, as defined at 40 C.F.R. §63.6675, does not include a time period before the compliance date for determining if an engine is limited use or not. Grand Casino Mille Lacs would like to reduce the expense of performance testing by operating the engines as limited use engines and testing every five years. If the operating hours

exceed 100 hours per calendar year after the compliance date because of emergency use or peaking use, then the engines will be tested every three years.

Table 2: Peaking Generators' Annual Hours of Operation

Emission Unit ID	Source Description	2011 Hours of Operation	2012 Hours of Operation	2013 Hours of Operation
EU-001	Main Casino Generator Set (2,000 kW)	131	204	66
EU-002	Event Center Generator Set (2,000 kW)	130	211	59
EU-003	Hotel Generator Set (1,400 kW)	102	140	69
EU-004	Chiller Generator Set (1,250 kW)	88	53	65

40 C.F.R. Subpart ZZZZ Compliance Discussion

EPA July 11, 2014 Letter Citation:

Please clarify whether you are in compliance with the initial compliance requirements of 40 C.F.R. 63, Subpart ZZZZ. Your permit application states that you have been granted a one-year extension to 40 C.F.R. 63, Subpart ZZZZ's initial compliance date of May 3, 2013, and that initial performance testing was completed in November, 2013.

Grand Casino Mille Lacs Response:

Initial performance testing for NO_x was completed on November 4-7, 2013 for EU-001, EU-002, EU-003, and EU-004. The testing results demonstrated that all four peaking engines achieved the required CO limits, the catalyst pressure drop and inlet temperature was recorded during the initial performance test, and the continuous parameter monitoring system (CPMS) was installed per 40 C.F.R. §63.6625(b), therefore, all four of the engines have met the initial compliance requirements of 40 C.F.R. Subpart ZZZZ, Table 5, 1 and 2. The Notification of Compliance Status was submitted December 20, 2013 which is 43 days after the initial performance testing, therefore, all four of the peaking engines have met the initial compliance requirement of 40 C.F.R. §63.6645(h)(2).

As indicated in 40 C.F.R. Subpart ZZZZ Table 5 and 40 C.F.R. §63.6645(a)(5), existing emergency generators do not have initial notification nor compliance demonstration requirements, therefore, EU-005 is in compliance with the initial compliance requirements of 40 C.F.R. 63, Subpart ZZZZ. The work practice standards have been completed for 2013 and 2014, as shown in the maintenance records.

Ms. Genevieve Damico
August 4, 2014
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If you have any questions or concerns regarding this response, please contact me at (320) 532-8126 or mnickaboine@grcasinos.com, or Julie Miller, Barr Engineering Company, (952) 832-2906 or jmiller2@barr.com.

Sincerely,



Michael Nickaboine
Vice President of Facilities

cc: Raymond Kegg, Grand Casino Mille Lacs
James Hutchinson, Grand Casino Mille Lacs
Julie Miller, Barr Engineering Company

Attachments:

Attachment 1 – Laundry Generator Maintenance Records

Attachment 2 – Laundry Generator Manufacturer Specifications

Attachment 1

Laundry Generator Maintenance Records

E50 ZIEGLER INC.
MINNEAPOLIS, MN
WGR6150

Services Performed Report

Page 1
9/21/14
14:55:12

Make	Serial Number	Contract Number	Contract Date	Status	Services Performed	Work Order Number	Date Performed	How meter
Customer: GRAND CASINO MILLE L 5914800 ONAMIA MN								
EF	4A03035	1573	11/03/92	OPEN	LEVEL 3 MAINTENANCE	WK12272	6/16/14	773
					LEVEL 2 MAINTENANCE	WK03877	5/15/13	767
					LEVEL 2 MAINTENANCE	WK95840	8/07/12	762
					LEVEL 2 MAINTENANCE	WK78895	7/14/10	758
					LEVEL 2 MAINTENANCE	WK69493	3/31/09	753
					LEVEL 2 MAINTENANCE	WK61089	4/14/08	748
					LEVEL 2 MAINTENANCE	WK53883	4/19/07	748
					LEVEL 2 MAINTENANCE	WK46827	4/25/05	748
					LEVEL 2 MAINTENANCE	WK40676	8/19/05	713
					LEVEL 2 MAINTENANCE	WE40680	2/20/95	413
					LEVEL 2 MAINTENANCE	WE35575	11/18/93	276
					LEVEL 2 MAINTENANCE	WE31159	11/03/92	90
		6/17/93	OPEN		LEVEL 1 INSPECTION	WK07980	11/07/13	269
					LEVEL 1 INSPECTION	WK98836	10/10/12	262
					LEVEL 1 INSPECTION	WK90736	10/18/11	257
					LEVEL 1 INSPECTION	WK82116	10/07/10	256
					LEVEL 1 INSPECTION	WK72638	11/11/09	253
					LEVEL 1 INSPECTION	WK64971	10/23/08	250
					LEVEL 1 INSPECTION	WK57281	10/09/07	242
					LEVEL 1 INSPECTION	WK38240	7/25/94	370
					LEVEL 1 INSPECTION	WE33199	6/17/93	182
		5/02/96	OPEN		LEVEL 5 MAINTENANCE	WK95840	6/08/12	
					LEVEL 5 MAINTENANCE	WK69493	4/09/09	
					LEVEL 5 MAINTENANCE	WK40676	8/19/05	
					LEVEL 5 MAINTENANCE		2/17/97	
		8/09/01	OPEN		LEVEL 3 MAINTENANCE	WK95840	6/07/12	
					LEVEL 3 MAINTENANCE	WK69493	4/01/09	
					LEVEL 3 MAINTENANCE	WK40676	8/19/05	
		8/09/01	OPEN		LEVEL 4 INSPECTION	WK95840	6/07/12	
					LEVEL 4 INSPECTION	WK69493	4/01/09	
					LEVEL 4 INSPECTION	WK40676	8/15/05	
		8/09/01	OPEN		LEVEL 6 Maintenance	WK95840	6/07/12	
					LEVEL 6 Maintenance	WK69493	4/10/09	
					LEVEL 6 Maintenance	WK40676	8/19/05	
		8/09/01	REVIEW		LEVEL 9 MAINTENANCE	WK12272	5/16/14	
					LEVEL 9 MAINTENANCE	WK81626	5/27/11	
					LEVEL 9 MAINTENANCE	WK61089	4/24/08	
					LEVEL 9 MAINTENANCE	WK40676	8/19/05	

** END OF REPORT **

ZIEGLER
Power Systems**WATCHGUARD**Maintenance Agreement
for
Standby and Load Sharing Applications5914800 - GRAND CASINO MILLE LACS
1573-02-014LEVEL 2 MAINTENANCE
7/21/14 REPRINT**Customer Information**Address : GRAND CASINO MILLE LACS
PO BOX 343
ONAMIA MN 56359-0343Date Performed : 6/16/14
Work Order : WK12272
Technician : 0312 - T.S. BERGLUND
Zone : M563A
SOS Unit # : 1573**Engine Information**Make : EF - DETROIT DI Oil Capacity : 15.00 Gallons Cooling Sys. Type : MOUNTED RAD
Model : 12V92 SAE : 30 Cooling Capacity : 40.00 Gallons
Serial : 4A03035 Fuel Type : Diesel Heater Voltage :
A/R # : SMU Meter : 773.00 Heater Wattage :
Last Oil SMU : 767.00**Generator Information**Make : W1 - WATCHGUARD Application : Standby --- Battery Charger Information ---
Model : D500 FPX4 Rated KW : 500.00 Input Voltage : 120.00
Serial : XC3783167M38 Voltage : 480 Output Voltage : 24.00
A/R # : KATO GENERATOR Amperage : Float Voltage : 26.20
Phase : 3.00**Location & Contacts**Location : GRAND CASINO Contact 1 : RAY KEGG Phone : 320 532-8307
RESER.BUS. HCR 67 BOX 194 Contact 2 : JIM HUTCHINSON 8017 Phone : 800 626-5825
ONAMIA MN 56359

5914800 - GRAND CASINO MILLE LACS
1573-02-014LEVEL 2 MAINTENANCE
7/21/14 REPRINT

Item	System or Item Description	Passed	Failed	Comments
PRE-START CHECKS				
COOLING SYSTEM				
001	Radiator/Heat Exchanger/Cooling System- visual inspection for leaks and damage.	X		
002	Hoses - Visual inspection of all hoses for condition. Check connections.	X		
003	Fan Drive Pulley - Check for loose or worn pulleys and lube fan drive.	X		
004	Fan Guard - Inspect for missing or broken parts.	X		
005	Fan Belts - Inspect for frayed or worn belts. Check tension and adjust.	X		
006	Coolant - Test PH level. Analyze coolant Add conditioner as needed.	X		
007	Filler Cap - Inspect filler cap gaskets and sealing surfaces.	X		
008	Water Pump - Visual inspection for leaks.	X		
009	Inspect Jacket Water Heater - Check for proper operation and thermostat settings	X		
LUBRICATION SYSTEM				
010	Oil Level - Inspect for proper level inspect for any leaks.	X		
011	Oil Heater/Prelube Pump - Inspect for proper operation.			NA
012	Crankcase Breather - Inspect hose & connections. Note excessive blowby.	X		
013	Crankcase Fumes Disposal System - Inspect. Filter #:			NA
AIR SYSTEM				
014	Air Filter - Inspect filter element and seals.	X		RECOMMENDS REPLACING AIR FILTERS
015	Air Inlet System - Inspect piping for damage or loose connections.	X		
FUEL SYSTEM/GOVERNOR				
016	Fuel Tank-Visually inspect for leaks & proper lvl. Analyze fuel. 1/4, 1/2, 3/4, FULL	X		1/2 FULL
017	Day Tank Pump - Check for proper operation. Check panel alarm lights.			NA
018	Fuel Priming Pump - Inspect for proper operation.	X		
019	Fuel Filters - Primary/Secondary. Inspect for damage or leaks.	X		REPLACED FILTERS
020	Water/Trap Separator - Drain water from tank or separator. If valves installed	X		
021	Fuel Lines - Check fuel line for leaks & tight connections. Check line brackets	X		
022	Governor & Cont. - Check gov oil level Inspect controls, linkage, wiring, Mag-pu	X		
EXHAUST SYSTEM				
023	Silencer & Piping - Inspect for damage or leakage. Check supports and rain cap	X		
024	Exhaust Manifold/Turbo - Inspect for damage, missing parts or oil slobbering.	X		
GENERATOR				
025	Coupling & Guards - Inspect for vibration and loose or missing parts	X		
026	Wiring - Inspect for loose connections, Inspect voltage regulator and mounts.	X		

5914800 - GRAND CASINO MILLE LACS
1573-02-014LEVEL 2 MAINTENANCE
7/21/14 REPRINT**GENERATOR - continued**

Item	System or Item Description	Passed	Failed	Comments
027	Rotating Rectifier - Inspect rotating rectifier wiring for loose connections.	X		
028	Stator & Rotor - Visually inspect for damage and check rotor air gap.	X		
STARTING SYSTEM				
029	Starting Motor/Alternator - Inspect connections and wiring.	X		
030	Battery Charger - Check for proper operation & loose terminals.	X		
031	Battery Charger - Measure and record battery charger float voltage.	X		FLOAT VOLTAGE - 26.42
032	Batteries - Check electrolyte level & specific gravity record readings.	X		REPLACED BATTERIES
033	Battery Cables - Clean & tighten all battery cable connections	X		
034	Battery Box - Wood: __, Plastic: __, Sealed: __, Open Type: __	X		
CONTROL PANEL/CABINETS				
035	Visual Inspection - Check for loose or broken wires and dirt accumulation	X		
036	Panel Lights - Operational check of illumination & safety lamps	X		
AUTOMATIC TRANSFER SWITCH (ATS) - MAIN				
037	PLC/ATS Batteries - Check. Replace every 24 months. Date Replaced:			NA
038	Visual Inspection - Check for loose or broken wires & dirt accumulation			NA
START UP & RUNNING CHECKS				
039	Start controls - Manual/Auto check for proper operation & general start ability	X		
040	Battery Voltage Drop - Check voltage drop and amp draw during cranking.	X		
041	Safety Controls - Test O/S, O/C, LOP, HWT, LWT, LWL for proper operation	X		
042	Remote Annunciators & Alarms - Test all panel & system alarms for proper opr.	X		
043	Check all Gauges and meters and record their readings below	X		
044	OP= _____ FP= _____ OT= _____ WT= _____ Alt Amps= _____	X		
045	AC Voltage A= _____ B= _____ C= _____	X		480 VOLTS
046	AC Amperage A= _____ B= _____ C= _____	X		NO LOAD
047	Frequency Meter - Check hertz for proper engine speed. Adjust if necessary	X		60.1 HZ
STARTING SYSTEM				
048	Alternator - Check for unusual noise and for proper operation. Check pulley.	X		
COOLING SYSTEM				
049	Thermostat - Inspect for proper operation	X		
050	Water Pump - Check for leaks & unusual noise or vibration	X		
051	Engine Attached Radiator - Check temperature drop across radiator core.	X		
AUTOMATIC TRANSFER SWITCH (ATS) - MAIN				

5914800 - GRAND CASINO MILLE LACS
1573-02-014LEVEL 2 MAINTENANCE
7/21/14 REPRINT**AUTOMATIC TRANSFER SWITCH (ATS) - MAIN - continued**

Item	System or Item Description	Passed	Failed	Comments
052	Operational Check - Check for engine start signal & general switch operation			NA
053	Check Generator voltage with utility power, adjust if necessary			NA

GENERATOR - INSTALLATION/ENCLOSURE

054	Enclosure Condition - Check for leaks, security, etc.	X		
055	Visual Inspection - For overall condition of generator set	X		
056	Vibration isolators - Inspect for broken springs or damaged cases	X		
057	Louvers - Check for proper operation of all louvers. Adjust if necessary.	X		

AFTER SHUTDOWN

058	Take oil sample - Recheck for proper crankcase level.	X		
059	Grease generator bearing--- 2 pumps annually.	X		GREASED REAR BEARING
060	Change engine oil and oil and fuel filters.	X		
061	Start unit and check for leaks.	X		
062	Check for proper crankcase level.	X		
063	Engine Lock-Out Switch - Test			NA
064	RESET ALL CONTROLS TO AUTOMATIC AND CLOSE GENERATOR BREAKER.	X		

ZIEGLER
Power Systems



WATCHGUARD
Maintenance Agreement
for
Standby and Load Sharing Applications

5914800 - GRAND CASINO MILLE LACS
1573-02-014

LEVEL 2 MAINTENANCE
7/21/14 REPRINT

REPAIR QUOTE TO FOLLOW.

ZIEGLER
Power Systems**WATCHGUARD**Maintenance Agreement
for
Standby and Load Sharing Applications5914800 - GRAND CASINO MILLE LACS
1573-01-009LEVEL 1 INSPECTION
7/21/14 REPRINT**Customer Information**Address : GRAND CASINO MILLE LACS
PO BOX 343
ONAMIA MN 56359-0343Date Performed : 11/07/13
Work Order : WK07980
Technician : 0051 - B.R. ANDERSON
Zone : M563A
SOS Unit # : 1573**Engine Information**Make : EF - DETROIT DI Oil Capacity : 15.00 Gallons Cooling Sys. Type : MOUNTED RAD
Model : 12V92 SAE : 30 Cooling Capacity : 40.00 Gallons
Serial : 4A03035 Fuel Type : Diesel Heater Voltage :
A/R # : SMU Meter : 769.00 Heater Wattage :
Last Oil SMU : 767.00**Generator Information**Make : W1 - WATCHGUARD Application : Standby --- Battery Charger Information ---
Model : D500 FPX4 Rated KW : 500.00 Input Voltage : 120.00
Serial : XC3783167M38 Voltage : 480 Output Voltage : 24.00
A/R # : KATO GENERATOR Amperage : Float Voltage : 26.20
Phase : 3.00**Location & Contacts**Location : GRAND CASINO Contact 1 : RAY KEGG Phone : 320 532-8307
RESER.BUS. HCR 67 BOX 194 Contact 2 : JIM HUTCHINSON 8017 Phone : 800 626-5825
ONAMIA MN 56359

5914800 - GRAND CASINO MILLE LACS
1573-01-009LEVEL 1 INSPECTION
7/21/14 REPRINT

Item	System or Item Description	Passed	Failed	Comments
PRESTART CHECKS				
COOLING SYSTEM				
001	Radiator/Heat Exchanger/Cooling System- visual inspection for leaks and damage.	X		
002	Hoses - Visual inspection of all hoses for condition. Check connections.	X		
003	Fan Drive Pulley - Check for loose or worn pulleys and lube fan drive.	X		
004	Fan Guard - Inspect for missing or broken parts.	X		
005	Fan Belts - Inspect for frayed or worn belts. Check tension and adjust.	X		
006	Coolant - Test PH level. Analyze coolant Add conditioner as needed.	X		SAMPLE TAKEN
007	Filler Cap - Inspect filler cap gaskets and sealing surfaces.	X		
008	Water Pump - Visual inspection for leaks.	X		
009	Inspect Jacket Water Heater - Check for proper operation and thermostat settings	X		
LUBRICATION SYSTEM				
010	Oil Level - Inspect for proper level inspect for any leaks.	X		
011	Oil Heater/Prelube Pump - Inspect for proper operation.			NA
012	Crankcase Breather - Inspect hose & connections. Note excessive blowby.	X		
013	Crankcase Fumes Disposal System - Inspect. Filter #:	X		OPEN
AIR SYSTEM				
014	Air Filter - Inspect filter element and seals.	X		
015	Air Inlet System - Inspect piping for damage or loose connections.	X		
FUEL SYSTEM/GOVERNOR				
016	Fuel Tank-Visually inspect for leaks & proper lvl. Analyze fuel. 1/4, 1/2, 3/4, FULL	X		1/2 FULL
017	Day Tank Pump - Check for proper operation. Check panel alarm lights.			NA
018	Fuel Priming Pump - Inspect for proper operation.			NA
019	Fuel Filters - Primary/Secondary. Inspect for damage or leaks.	X		
020	Water/Trap Separator - Drain water from tank or separator. If valves installed	X		
021	Fuel Lines - Check fuel line for leaks & tight connections. Check line brackets	X		
022	Governor & Cont. - Check gov oil level Inspect controls, linkage, wiring, Mag-pu	X		
EXHAUST SYSTEM				
023	Silencer & Piping - Inspect for damage or leakage. Check supports and rain cap	X		
024	Exhaust Manifold/Turbo - Inspect for damage, missing parts or oil slobbering.	X		
GENERATOR				
025	Coupling & Guards - Inspect for vibration and loose or missing parts	X		
026	Wiring - Inspect for loose connections, Inspect voltage regulator and mounts.	X		

5914800 - GRAND CASINO MILLE LACS
1573-01-009LEVEL 1 INSPECTION
7/21/14 REPRINT**GENERATOR - continued**

Item	System or Item Description	Passed	Failed	Comments
027	Rotating Rectifier - Inspect rotating rectifier wiring for loose connections.	X		
028	Stator & Rotor - Visually inspect for damage and check rotor air gap.	X		

STARTING SYSTEM

029	Starting Motor/Alternator - Inspect connections and wiring.	X		
030	Battery Charger - Check for proper operation & loose terminals.	X		
031	Battery Charger - Measure and record battery charger float voltage.	X		FLOAT VOLTAGE - 26.30
032	Batteries - Check electrolyte level & specific gravity record readings.	X		MAINT FREE
033	Battery Cables - Clean & tighten all battery cable connections	X		
034	Battery Box - Wood: _____, Plastic: _____, Sealed: _____, Open Type: _____	X		PLASTIC BOX

CONTROL PANEL/CABINETS

035	Visual Inspection - Check for loose or broken wires and dirt accumulation	X		
036	Panel Lights - Operational check of illumination & safety lamps	X		

AUTOMATIC TRANSFER SWITCH (ATS)- MAIN

037	PLC/ATS Batteries - Check. Replace every 24 months. Date Replaced: _____			NA
038	Visual Inspection - Check for loose or broken wires & dirt accumulation	X		

START UP & RUNNING CHECKS

039	Start controls - Manual/Auto check for proper operation & general start ability	X		
040	Battery Voltage Drop - Check voltage drop and amp draw during cranking.	X		VOLTAGE DROP - 20.56V
041	Safety Controls - Test O/S, O/C, LOP, HWT, LWT, LWL for proper operation	X		
042	Remote Annunciators & Alarms - Test all panel & system alarms for proper opr.	X		
043	Check all Gauges and meters and record their readings below	X		
044	OP= _____ FP= _____ WT= _____ OT= _____ WT= _____ Alt Amps= _____	X		OP-40 PSI WT-170°F AA-2V
045	AC Voltage A= _____ B= _____ C= _____	X		490 VOLTS
046	AC Amperage A= _____ B= _____ C= _____	X		NO LOAD
047	Frequency Meter - Check hertz for proper engine speed. Adjust if necessary	X		60.1 HZ

STARTING SYSTEM

048	Alternator - Check for unusual noise and for proper operation. Check pulley.	X		
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COOLING SYSTEM

049	Thermostat - Inspect for proper operation	X		
050	Water Pump - Check for leaks & unusual noise or vibration	X		
051	Engine Attached Radiator - Check temperature drop across radiator core.	X		

AUTOMATIC TRANSFER SWITCH (ATS) - MAIN

5914800 - GRAND CASINO MILLE LACS
1573-01-009LEVEL 1 INSPECTION
7/21/14 REPRINT**AUTOMATIC TRANSFER SWITCH (ATS) - MAIN - continued**

Item	System or Item Description	Passed	Failed	Comments
052	Operational Check - Check for engine start signal & general switch operation	X		NO TRANSFER
053	Check Generator voltage with utility power, adjust if necessary	X		

GENERATOR - INSTALLATION/ENCLOSURE

054	Enclosure Condition - Check for leaks, security, etc.	X		
055	Visual Inspection - For overall condition of generator set	X		
056	Vibration isolators - Inspect for broken springs or damaged cases	X		
057	Louvers - Check for proper operation of all louvers. Adjust if necessary.			NA

AFTER SHUTDOWN

058	Take oil sample - Recheck for proper crankcase level.	X		
059	Grease generator bearing--- 2 pumps annually.	X		
060				
061				
062				
063	Engine Lock-Out Switch - Test			NA
064	RESET ALL CONTROLS TO AUTOMATIC AND CLOSE GENERATOR BREAKER.	X		



WATCHGUARD
Maintenance Agreement
for
Standby and Load Sharing Applications

5914800 - GRAND CASINO MILLE LACS
1573-01-009

LEVEL 1 INSPECTION
7/21/14 REPRINT

INSPECTION COMPLETED.

5914800 - GRAND CASINO MILLE LACS
1573-02-013LEVEL 2 MAINTENANCE
7/21/14 REPRINT**Customer Information**

Address :	GRAND CASINO MILLE LACS PO BOX 343 ONAMIA MN 56359-0343	Date Performed :	5/15/13
		Work Order :	WK03877
		Technician :	0312 - T.S. BERGLUND
		Zone :	M563A
		SOS Unit # :	1573

Engine Information

Make :	EF - DETROIT DI	Oil Capacity :	15.00 Gallons	Cooling Sys. Type :	MOUNTED RAD
Model :	12V92	SAE :	30	Cooling Capacity :	40.00 Gallons
Serial :	4A03035	Fuel Type :	Diesel	Heater Voltage :	
A/R # :		SMU Meter :	767.00	Heater Wattage :	
		Last Oil SMU :	762.00		

Generator Information

Make :	W1 - WATCHGUARD	Application :	Standby	--- Battery Charger Information ---	
Model :	D500 FPX4	Rated KW :	500.00	Input Voltage :	120.00
Serial :	XC3783167M38	Voltage :	480	Output Voltage :	24.00
A/R # :	KATO GENERATOR	Amperage :		Float Voltage :	26.20
		Phase :	3.00		

Location & Contacts

Location :	GRAND CASINO	Contact 1 :	RAY KEGG	Phone :	320 532-8307
	RESER.BUS. HCR 67 BOX 194	Contact 2 :	JIM HUTCHINSON 8017	Phone :	800 626-5825
	ONAMIA MN 56359				

5914800 - GRAND CASINO MILLE LACS
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 LEVEL 2 MAINTENANCE
 7/21/14 REPRINT

Item	System or Item Description	Passed	Failed	Comments
PRE-START CHECKS				
COOLING SYSTEM				
001	Radiator/Heat Exchanger/Cooling System-visual inspection for leaks and damage.	X		
002	Hoses - Visual inspection of all hoses for condition. Check connections.	X		
003	Fan Drive Pulley - Check for loose or worn pulleys and lube fan drive.	X		
004	Fan Guard - Inspect for missing or broken parts.	X		
005	Fan Belts - Inspect for frayed or worn belts. Check tension and adjust.	X		
006	Coolant - Test PH level. Analyze coolant Add conditioner as needed.	X		SAMPLE TAKEN
007	Filler Cap - Inspect filler cap gaskets and sealing surfaces.	X		
008	Water Pump - Visual inspection for leaks.	X		
009	Inspect Jacket Water Heater - Check for proper operation and thermostat settings	X		
LUBRICATION SYSTEM				
010	Oil Level - Inspect for proper level inspect for any leaks.	X		
011	Oil Heater/Prelube Pump - Inspect for proper operation.			NA
012	Crankcase Breather - Inspect hose & connections. Note excessive blowby.	X		
013	Crankcase Fumes Disposal System - Inspect. Filter #:			NA
AIR SYSTEM				
014	Air Filter - Inspect filter element and seals.	X		
015	Air Inlet System - Inspect piping for damage or loose connections.	X		
FUEL SYSTEM/GOVERNOR				
016	Fuel Tank-Visually inspect for leaks & proper lvl. Analyze fuel. 1/4, 1/2, 3/4, FULL	X		1/2 FULL
017	Day Tank Pump - Check for proper operation. Check panel alarm lights.			NA
018	Fuel Priming Pump - Inspect for proper operation.			NA
019	Fuel Filters - Primary/Secondary. Inspect for damage or leaks.	X		
020	Water/Trap Separator - Drain water from tank or separator. If valves installed	X		
021	Fuel Lines - Check fuel line for leaks & tight connections. Check line brackets	X		
022	Governor & Cont. - Check gov oil level Inspect controls, linkage, wiring, Mag-pu	X		
EXHAUST SYSTEM				
023	Silencer & Piping - Inspect for damage or leakage. Check supports and rain cap	X		
024	Exhaust Manifold/Turbo - Inspect for damage, missing parts or oil slobbering.	X		
GENERATOR				
025	Coupling & Guards - Inspect for vibration and loose or missing parts	X		
026	Wiring - Inspect for loose connections, Inspect voltage regulator and mounts.	X		

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GENERATOR - continued				
Item	System or Item Description	Passed	Failed	Comments
027	Rotating Rectifier - Inspect rotating rectifier wiring for loose connections.	X		
028	Stator & Rotor - Visually inspect for damage and check rotor air gap.	X		
STARTING SYSTEM				
029	Starting Motor/Alternator - Inspect connections and wiring.	X		
030	Battery Charger - Check for proper operation & loose terminals.	X		
031	Battery Charger - Measure and record battery charger float voltage.	X		FLOAT VOLTAGE - 26.59
032	Batteries - Check electrolyte level & specific gravity record readings.	X		MAINT FREE
033	Battery Cables - Clean & tighten all battery cable connections	X		
034	Battery Box - Wood: _____, Plastic: _____ Sealed: _____, Open Type: _____	X		
CONTROL PANEL/CABINETS				
035	Visual Inspection - Check for loose or broken wires and dirt accumulation	X		
036	Panel Lights - Operational check of illumination & safety lamps	X		
AUTOMATIC TRANSFER SWITCH (ATS) - MAIN				
037	PLC/ATS Batteries - Check. Replace every 24 months. Date Replaced: _____			NA
038	Visual Inspection - Check for loose or broken wires & dirt accumulation	X		
START UP & RUNNING CHECKS				
039	Start controls - Manual/Auto check for proper operation & general start ability	X		
040	Battery Voltage Drop - Check voltage drop and amp draw during cranking.			NA +
041	Safety Controls - Test O/S, O/C, LOP, HWT, LWT, LWL for proper operation	X		
042	Remote Annunciators & Alarms - Test all panel & system alarms for proper opr.	X		
043	Check all Gauges and meters and record their readings below	X		
044	OP= _____ FP= _____ OT= _____ WT= _____ Alt Amps= _____	X		OP-80 PSI WT-160°F
045	AC Voltage A= _____ B= _____ C= _____	X		480 VOLTS
046	AC Amperage A= _____ B= _____ C= _____			NA
047	Frequency Meter - Check hertz for proper engine speed. Adjust if necessary	X		
STARTING SYSTEM				
048	Alternator - Check for unusual noise and for proper operation. Check pulley.	X		
COOLING SYSTEM				
049	Thermostat - Inspect for proper operation	X		
050	Water Pump - Check for leaks & unusual noise or vibration	X		
051	Engine Attached Radiator - Check temperature drop across radiator core.	X		
AUTOMATIC TRANSFER SWITCH (ATS) - MAIN				

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7/21/14 REPRINT**AUTOMATIC TRANSFER SWITCH (ATS) - MAIN - continued**

Item	System or Item Description	Passed	Failed	Comments
052	Operational Check - Check for engine start signal & general switch operation			NA
053	Check Generator voltage with utility power, adjust if necessary			NA

GENERATOR - INSTALLATION/ENCLOSURE

054	Enclosure Condition - Check for leaks, security, etc.	X		
055	Visual Inspection - For overall condition of generator set	X		
056	Vibration isolators - Inspect for broken springs or damaged cases	X		
057	Louvers - Check for proper operation of all louvers. Adjust if necessary.	X		

AFTER SHUTDOWN

058	Take oil sample - Recheck for proper crankcase level.	X		
059	Grease generator bearing--- 2 pumps annually.			NA
060	Change engine oil and oil and fuel filters.	X		
061	Start unit and check for leaks.	X		
062	Check for proper crankcase level.	X		
063	Engine Lock-Out Switch - Test			NA
064	RESET ALL CONTROLS TO AUTOMATIC AND CLOSE GENERATOR BREAKER.	X		

ZIEGLER
Power Systems



WATCHGUARD
Maintenance Agreement
for
Standby and Load Sharing Applications

5914800 - GRAND CASINO MILLE LACS
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LEVEL 2 MAINTENANCE
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INSPECTION COMPLETED.

Attachment 2

Laundry Generator Manufacturer Specifications



WATCHGUARD
Maintenance Agreement
for
Standby and Load Sharing Applications

5914800 - GRAND CASINO MILLE LACS
1573-02-013

LEVEL 2 MAINTENANCE
7/03/13

Customer Information

Address :	GRAND CASINO MILLE LACS PO BOX 343 ONAMIA MN 56359-0343	Date Performed :	5/15/13
		Work Order :	WKO3877
		Technician :	0312 - T.S. BERGLUND
		Zone :	M563A
		SOS Unit # :	1573

Engine Information

Make :	EF - DETROIT DI	Oil Capacity :	15.00 Gallons	Cooling Sys. Type :	MOUNTED RAD
Model :	12V92	SAE :	30	Cooling Capacity :	40.00 Gallons
Serial :	4A03035	Fuel Type :	Diesel	Heater Voltage :	
A/R # :		SMU Meter :	767.00	Heater Wattage :	
		Last Oil SMU :	762.00		

Generator Information

Make :	W1 - WATCHGUARD	Application :	Standby	--- Battery Charger Information ---	
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	ONAMIA MN 56359				



United States
Environmental Protection
Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Nickaboine (First) Michael (MI) J

Title Vice President of Facilities

Street or P.O. Box 777 Grand Avenue, Highway 169

City Onamia State MN ZIP 56359 -

Telephone (320) 532 - 8126 Ext. Facsimile (320) 532 - 8392

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) *Michael Nickaboine*

Name (typed) Michael Nickaboine Date: / /

**INSTRUCTIONS FOR CTAC
CERTIFICATION OF TRUTH, ACURACY, and COMPLETENESS**

Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 209 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

DETAILED INSTRUCTIONS

This form is for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

Section A - Title V permit applications must be signed by a responsible official. The definition of responsible official can be found at ' 70.2.

Section B - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms is mailed to the permitting authority.